

EXHIBIT K

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

EPIC SYSTEMS CORPORATION, a
Wisconsin Corporation,

Plaintiff,

Case No. 14-CV-748

v.

TATA CONSULTANCY SERVICES
LIMITED, an Indian Corporation; and TATA
AMERICA INTERNATIONAL
CORPORATION (dba TCS AMERICA), a
New York Corporation,

Defendants.

**PROPOSED DISCOVERY REQUESTS TO
TATA CONSULTANCY SERVICE LIMITED AND
TATA AMERICA INTERNATIONAL CORPORATION**

Pursuant to Federal Rules of Civil Procedure 26(d) and 34, Plaintiff Epic Systems Corporation (“Epic”) hereby propounds the following expedited requests for production of documents to Defendants Tata Consultancy Services Limited and Tata America International Corporation (dba TCS America) (collectively, “TCS” or “Defendants”) and demands that TCS produce all responsive documents within 30 calendar days from the date of service of these requests, at the offices of Jenner & Block LLP, 633 West 5th Street, Floor 36, Los Angeles, California 90071, or by electronic mail or another electronic method agreed upon by the parties.

DEFINITIONS

1. The terms “and” and “or” as used herein shall include each other within their meaning, whether both are referenced or otherwise.

2. The terms “any” and “all” as used herein shall include each other within their meaning, whether both are referenced or otherwise.

3. The terms “refer” and “relate” and all forms of these terms, as used herein, shall mean having any logical or factual connection with the matter discussed and includes, without limitation: analyzing, concerning, consisting of, describing, discussing, embodying, evidencing, identifying, including, pertaining to, memorializing, mentioning, naming, negating, recording, reflecting, showing, supporting, or summarizing.

4. The term “document(s)” as used herein shall refer to any means of writing and includes, without limitation: the original or a non-identical copy as well as drafts and all versions of all writings and recordings; material that is stored, compiled or organized by means of any electronic, magnetic, optical or mechanical device, such as by handwriting, typewriting, or printing; agreements, analytical data, audio recordings, books, calendars, computer tapes, computer storage media, contracts, correspondence, diagrams, diaries, email, facsimiles, forms, interoffice communications, letters, memoranda, messages, notes, papers, pleadings, proposals, reports, studies, surveys, video recordings, worksheets; and any writing or recording prepared on or with any other physical objects.

5. The terms “communication” or “communicate” as used herein shall refer to any form of information exchange, or attempted exchange, including but not limited to: written, oral, or electronic exchanges; exchanges by letter, telephone, facsimile, email, face-to-face conversation, meeting, or conference; any exchange whether or not written, taped, or recorded; any exchange without limit to the time, place, or circumstances of its occurrence; and/or any other transmittal of information by any media by any manner.

6. The terms “TCS,” “you” and “your” as used herein shall refer to Defendants Tata Consultancy Services Limited and Tata America International Corporation (dba TCS America), including their agents, employees, representatives or any person acting or purporting to act on its behalf.

7. The term “Epic” as used herein shall refer to Plaintiff Epic Systems Corporation.

8. The term “UserWeb” as used herein shall refer to Epic’s UserWeb portal, as discussed in the Complaint.

9. The term “Med Mantra” as used herein shall refer to the software developed by TCS that is at issue in the Complaint.

REQUESTS

REQUEST NO. 1

All documents or communications that refer or relate to your access to or downloading of Epic documents from the UserWeb.

REQUEST NO. 2

All documents or communications that refer or relate to your log-in or access credentials for the UserWeb.

REQUEST NO. 3

Documents sufficient to identify the name, title, and location of all TCS employees or agents who accessed the UserWeb to download Epic documents or information, or who received any Epic document downloaded from the UserWeb.

REQUEST NO. 4

All Epic documents or communications that refer or relate to Epic documents in TCS's possession that were downloaded from the UserWeb, or marked as confidential and obtained from any source.

REQUEST NO. 5

All documents or communications that refer or relate to your use, analysis, or review of Epic documents or information downloaded from the UserWeb in connection with Med Mantra or any other product designed, developed, manufactured, marketed, or sold by TCS.

REQUEST NO. 6

All documents or communications that refer or relate to your destruction or deletion of any Epic documents or information, or destruction of any communications regarding Epic documents or information.

REQUEST NO. 7

All communications to or from any TCS employee (including but not limited to Ramesh Gajaram, Answin Kumar Anandhan, Sankari Gunasekaram, Suresh Muthuswami, or Syama Sundar Peesapati) regarding access to or downloading of documents from Epic's UserWeb.

REQUEST NO. 8

All documents regarding any TCS document storage system, file structure, or physical repository for storing Epic documents downloaded from UserWeb.

REQUEST NO. 9

All documents or communications that refer or relate to Epic source code.

Dated: November __, 2014

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